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|-----|--|-------------|------------------------------|--|--|
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| U | Talmois(e) Kon via w .50m | | | | |
| 7 | Attorneys for Defendant | | | | |
| 8 | Las Vegas Metropolitan Police Department | | | | |
| o | UNITED STATES D | ISTRICT COU | RT | | |
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| | DISTRICT OF NEVADA | | | | |
| 10 | DAICHENA THOMAS, individually and as the | CASE NO.: | 2:22-cv-0899-GMN-NJK | | |
| 11 | personal representative of Estate of Palmer | CASE NO | 2.22-CV-0899-GIVIN-INJK | | |
| 11 | Pearce Joseph Wright; DANA THOMAS, | | | | |
| 12 | individually; DEVONTAY THOMAS, | STIPULAT | ION TO EXTEND TIME TO | | |
| | individually; DELON ARMSTRONG, | | EPLIES IN SUPPORT OF | | |
| 13 | individually; J. W., individually; GERMAINE | MOTI | ONS FOR SUMMARY | | |
| 14 | CARMENA, individually, | | JUDGMENT (Second Request) | | |
| 17 | Plaintiffs, | | [ECF Nos. 79, 80] | | |
| 15 | vs. | | • • | | |
| 1.6 | CLADY COLDITY, LAC VECAC | | | | |
| 16 | CLARK COUNTY; LAS VEGAS METROPOLITAN POLICE DEPARTMENT; | | | | |
| 17 | CLARK COUNTY DETENTION CENTER; | | | | |
| 1, | WELLPATH, LLC; CORRECT CARE | | | | |
| 18 | SOLUTIONS, LLC; J. MARCOS, RN; EARL | | | | |
| 1.0 | D. SALVIEJO, NP; TANJA WASIELEWSKI, | | | | |
| 19 | RN; H. TADDEO, RN; ACE T., RN; LARS WILLIAMS, RN; H. HANNASH, RN; DAVID | | | | |
| 20 | OLIPHANT, PA; LPN ALEXIA; BECKY S. | | | | |
| 20 | CHRISTENSEN, RN; RAY MARTIN | | | | |
| 21 | MONTENEGRO, NP; KATE PURCELL, RN; | | | | |
| | DOES I through C, inclusive, and ROE | | | | |
| 22 | CORPORATIONS I through II, inclusive, | | | | |
| 23 | Defendants. | | | | |
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| 1 | The above-referenced parties, by and through their counsel of record, hereby agree and | | |
|----|--|---|--|
| 2 | stipulate to extend the current deadline of August 23, 2024 for Defendants, Las Vegas | | |
| 3 | Metropolitan Police Department ("LVMPD"); Wellpath, LLC; Correct Care Solutions, LLC; J. | | |
| 4 | Marcos, RN; Earl D. Salviejo, NP; Tanja Wasielewski, RN; H. Taddeo, RN; Ace T. RN; Lars | | |
| 5 | Williams, RN; H. Hannash, RN; David Oliphant, PA, LPN Alexia; Becky S. Christensen, RN; | | |
| 6 | Ray Martin Montenegro, NP, and Kate Purcell, RN's ("Wellpath Defendants") to file their | | |
| 7 | respective Replies in Support of their Motions for Summary Judgment, [Docket Nos. 79 and 80], | | |
| 8 | for an additional seven (7) days, until August 30, 2024. This is the second requested extension | | |
| 9 | between the parties. The extension is being requested as the Defendants' Counsel requires | | |
| 10 | additional time to finish preparing the replies due to the extent of the briefing on the Motions and | | |
| 11 | Responses; as well as other contemporaneous deadlines. | | |
| 12 | The requested extension will not prejudice any party and will allow the Defendants to | | |
| 13 | adequately brief their replies in support of their Motions for Summary Judgment filed with this | | |
| 14 | Court. The parties are not delaying the conclusion of this matter by way of trial or otherwise; no | | |
| 15 | trial date has yet been ordered. | | |
| 16 | DATED this <u>23rd</u> day of August, 2024. | DATED this 23rd day of August, 2024. | |
| 17 | STOVALL & ASSOCIATES | KAEMPFER CROWELL | |
| 18 | /s/ Ross H. Moynihan | /s/ Lyssa S. Anderson | |
| 19 | Leslie Mark Stovall, Esq. Nevada Bar No. 2566 | Lyssa S. Anderson Nevada Bar No. 5781 | |
| 20 | Ross H. Moynihan, Esq. Nevada Bar No. 11848 | Ryan W. Daniels Nevada Bar No. 13094 | |
| 21 | 2301 Palomino Lane Las Vegas, NV 89107 | 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135 | |
| 22 | Attorneys for Plaintiffs | Attorneys for Defendant Las Vegas Metropolitan Police Department | |
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| 1 | DATED this <u>23rd</u> day of August, 2024. |
| 2 | LEWIS BRISBOIS BISGAARD & SMITH LLP |
| 3 | /s/ Ethan M. Featherstone |
| 4 | S. Brent Vogel, Esq. Nevada Bar No. 6858 |
| 5 | Ethan M. Featherstone, Esq. Nevada Bar No. 11566 |
| 6 | 6385 S. Rainbow Blvd., Ste. 600 Las Vegas, NV 89118 |
| 7 | Attorneys for Defendants WellPath, LLC; Correct Care Solutions, LLC; |
| 8 | J. Marcos, RN; Earl D. Salviejo, NP; Tanya Wasielewski, RN; H. Taddeo, RN; Ace T. RN; |
| 9 | Lars Williams, RN; H. Hannash, RN; David |
| 10 | Oliphant, PA; LPN Alexia; Becky S. Christensen, RN; Ray Martin Montenegro, |
| | NP; and Kate Purcell, RN |
| 11 | <u>ORDER</u> |
| 12 | |
| 13 | IT IS SO ORDERED. Dated this 27 day of August, 2024. |
| 14 | Dated this 27 day of August, 2024. |
| 15 | UNITED STATES DISTRICT COURT JUDGE |
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